

1 EDWIN K. PRATHER, SBN 190536  
2 CRAIG H. BESSENGER, SBN 245787  
3 CLARENCE & DYER LLP  
4 899 Ellis Street  
5 San Francisco, California 94109  
6 Telephone: 415.749.1800  
7 Facsimile: 415.749.1694  
8 Email: eprather@clarencedyer.com  
9 cbessenger@clarencedyer.com

10 Attorneys for Defendants  
11 SYNPEP CORPORATION and CHI YANG

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 OAKLAND DIVISION

15 UNITED STATES OF AMERICA,  
16 Plaintiff,  
17 v.  
18 SYNPEP CORPORATION and  
19 CHI YANG,  
20 Defendants.

Case No. CR 06-0374 SBA

**STIPULATION AND ORDER TO  
RECONVEY PROPERTY**

21 On May 31, 2006, this Court signed an order releasing Defendant Chi Yang on a  
22 \$500,000 bond and imposing various conditions of release. The \$500,000 bond was secured by  
23 property located at 2189 Las Trampas Road in Alamo, CA (the "Las Trampas Property"). The  
24 Las Trampas Property is owned by Mr. Yang and his wife, Angela Chiang.

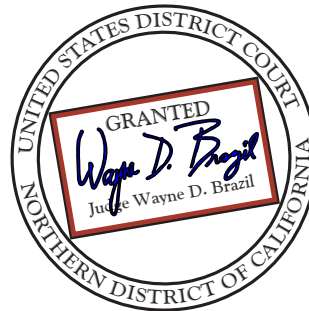
25 In light of the imminent resolution of this matter, Mr. Yang and the government  
26 engaged in negotiations regarding modifying Mr. Yang's bond securing his release. These  
27 negotiations ultimately resulted in a stipulation that Mr. Yang's bond be lowered to \$75,000, to  
28 be secured with cash, and that the Las Trampas Property be fully reconveyed. The Court signed  
an order to that effect on March 11, 2008, and Mr. Yang has since posted the \$75,000 with the  
Court.

1 Prior to the agreement to secure Mr. Yang's release with cash, other properties  
2 were contemplated as security by Mr. Yang and the government. One of these properties, located  
3 at 500 Treyburn Circle in San Ramon, CA, is owned by Mr. Yang's mother (the "Treyburn  
4 Property"). A deed of trust conveying the Treyburn Property to the Court was recorded in  
5 anticipation of the property being used to secure Mr. Yang's release. The Court's order to secure  
6 Mr. Yang's release with cash has rendered this lien on the Treyburn Property unnecessary. Mr.  
7 Yang now respectfully requests that the Court order the Treyburn Property to be fully  
8 reconveyed.

9 The reconveyance has been discussed with Assistant United States Attorney  
10 Stacey Geis, who does not oppose it.

11  
12  
13 IT IS SO ORDERED.

14 Dated: April 22, 2008



15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
WAYNE D. BRAZIL  
UNITED STATES MAGISTRATE JUDGE

Approved as to form:

/s/: Craig H. Bessenger  
CRAIG H. BESSENGER  
Attorneys for Defendant Chi Yang

/s/: Stacey Geis  
STACEY GEIS  
Assistant United States Attorney

**Proof of Service**

I, Stephanie Chan, declare as follows:

I am over eighteen years of age and not a party to the within action; my business address is 899 Ellis Street, San Francisco, California 94109; I am employed in the County of San Francisco.

On April 21, 2008, I served a copy, with all exhibits, of the following documents:

- STIPULATION AND [PROPOSED] ORDER TO RECONVEY PROPERTY

X  (BY ELECTRONIC SERVICE) I caused an electronic delivery subject to 28 U.S.C ¶1746, Local Rules or General Orders of this Court regarding Electronic Case Filing. All pleadings and papers must be electronically served in accordance with those Rules or General Orders with email address(es) as noted below:

<p><b>Stacey P. Geis</b>  U.S. Attorney's Office  450 Golden Gate Avenue  11th floor  San Francisco, CA 94102  415-436-7200  Email: Stacey.Geis@usdoj.gov</p>	<p><b>Ioana Petrou</b>  U.S. Attorney's Office  450 Golden Gate Avenue, 11th Floor  San Francisco, CA 94102  415-436-7189 or 308-7898  Fax: 415-436-7234  Email: ioana.petrou@usdoj.gov</p>
---	---

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct and that this declaration was executed on the above stated date.

/s/: Stephanie Chan   
Stephanie Chan

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28